UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE NASHVILLE DIVISION

UNITED S	TATES DISTRI	CT COURT	
		OF TENNESSEE	
	SHVILLE DIVIS		
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UNITED STATES OF AMERICA	`		This motion of what
UNITED STATES OF AMERICA)	NI. 2.11 00002 10	Ihm mount
)	No. 3:11-00083-19	neille Maca
v.)	M	INEN BAHENEN
)	Chief Judge Haynes	rejudice
JUANA EDITH VELA-SALINAS)		DENVED esthort rejudice so herew for Impeling
		2	The Marile A
MOTION TO CONTINUE TRIAL TO HOLD A DAUBERT HEARING OR,			
ALTERNATIVELY, TO PROHIBIT			
•			and
The United States of America, by its attorneys David Rivera, United States Attorney for Kullen			
the Middle District of Tennessee, and Brent A. Hannafan, Assistant United States Attorney,			
difund			
respectfully requests that this Court continue the trial date of July 29, 2104, due to the July 7, 2014			
disclosure of a forensic accountant as an expert witness on defendant's behalf.			
disclosure of a forensie accountant as an	expert withess o	ii defendant 3 benam,	1- /-
The United States respectfully re-	quests this Court	continue the trial in order to	o hold a Lill XX
"Daubert hearing" pursuant to Rules 403	3, 702, 703, and 7	704 of the Federal Rules of	Evidence to 1-23-14
determine whether defendant's expert sho	ould be permitted	I to testify at trial In the alt	ternative the

Background

United States requests this Court order that defendant's expert, Ron Hickman, be prohibited from

testifying at trial.

On July 7, 2014, defendant's counsel disclosed that defendant would call an expert witness at trial and provided a report prepared by a forensic accountant, Ron Hickman, CPA/CFF, CFE. The report is dated June 30, 2104. It describes a forensic accounting of defendant's bank accounts and records relating to the purchase and sale of vehicles allegedly involved in the money laundering conspiracy charged in Count Two of the pending indictment. The report and the ten exhibits attached thereto are approximately 50 pages long. A copy of the report and exhibits is attached hereto as Exhibit 1.